

Exhibit A

04:11:00 p.m. 04-10-2015

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04/10/15 04:17PM PDT ->

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FILEDSuperior Court of California
County of Los Angeles

APR 10 2015

Sherri R. Carter, Executive Officer/Clerk

By Dawn Alexander Deputy
Dawn Alexander

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Attorneys for Plaintiff,
 SALVADOR NAVARRO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SALVADOR NAVARRO, an individual,

CASE NO:

BC 6 77 056

Plaintiff,

vs.

CIVIL COMPLAINT FOR:

DHL GLOBAL FORWARDING, a California
 business, form unknown; and DOES 1
 through 50, inclusive,

Defendants.

1. Intentional Infliction of Emotional Distress;
2. Wrongful Termination in Violation of Public Policy;
3. Violation of Unfair Business Practices Act;
4. Age Discrimination;
5. Disability Discrimination;
6. Failure to Reasonably Accommodate;
7. Failure to Engage in the Interactive Process;
8. Retaliation;
9. Failure to Take all Reasonable Steps to Prevent Discrimination;
10. Violation of Labor Code section 1102.5.

PLAINTIFF ALLEGES AS FOLLOWS:

THE PARTIES

1. Plaintiff, SALVADOR NAVARRO (hereinafter "Plaintiff" or "NAVARRO"), is,
 and at all relevant times was, an individual residing in Los Angeles County, California;

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COMPLAINT

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CIT/CASE: BC577056
LEA/DEF#: 11

RECEIPT #: CCH481620028
 DATE: 04/13/15 11:44 AM
 FEE: \$435.00
 CHECK: \$0.00
 CASH: \$0.00
 HANGE: \$0.00
 ARD: \$435.00

2. At all times relevant herein, Defendant DHL GLOBAL FORWARDING (hereinafter "Defendant" OR "DHL"), a California business, form unknown, was and is an entity, organized and existing under the laws of the State of California, having its principal place of operation within the County of Los Angeles.

3. DOES ONE through FIFTY, inclusive, are sued herein pursuant to Code of Civil Procedure section 474. Plaintiff is informed and believes, and based on such information and belief, alleges that the DOE defendants participated, condoned, acted, and/or conspired with others in the discriminatory employment and tortious practices that harmed Plaintiff. Plaintiff is ignorant of the true names or capacities of the Defendants sued herein under fictitious names DOES ONE through FIFTY, inclusive. Plaintiff will amend this complaint to allege their true names and capacities when the same are ascertained.

JURISDICTION AND VENUE

4. The harm complained of in this Complaint occurred in Los Angeles County and all parties reside therein.

5. Plaintiff has sustained damages in excess of the minimal jurisdictional requirement of this Court.

6. Defendants' principal place of business operations is in Los Angeles County.

7. On March 23, 2014, Plaintiff filed an administrative complaint with the Department of Fair Employment and Housing (hereafter "DFEH") complaining of age and disability discrimination, among other matters. Plaintiff requested a "right-to-sue" letter, which was issued by the DFEH on March 23, 2015.

FACTUAL ALLEGATIONS

8. DHL is a logistics company engaged in the business of providing shipping services to customers who desire to have items shipped to distant locations. In so doing, DHL employs more than seventy-five (75) employees.

9. Plaintiff is an individual who was employed by DHL from November 11, 1992 to July 26, 2013. Plaintiff was employed by DHL as a driver to transport goods from the DHL facility to the Los Angeles International Airport for shipping.

1 10. From November 11, 1992 to July 19, 2013, DHL refused to allow Plaintiff to take a
2 lunch break, or rest periods as mandated by the California Labor Code. In fact, DHL requires all
3 drivers to sign a form waiving their right to lunch or breaks on threat of job termination.

4 11. DHL knew that Plaintiff was/is a diabetic, which made achievement of his job
5 duties more difficult. Plaintiff informed, and DHL acknowledged, that Plaintiff needed to take
6 lunch breaks to eat in order to maintain his blood sugar levels in a proper balance.

7 12. However, DHL has and maintains a corporate policy of not accommodating
8 employees with disabilities. DHL refused to allow the Plaintiff to take his legally mandated lunch
9 period and refused to reasonably accommodate Plaintiff's disability by allowing him a lunch
10 period.

11 13. Plaintiff is fifty-five (55) years old. He had worked for DHL for over 21 years
12 before he was fired.

13 14. Additionally, for at least the last five years of his employment with DHL, Plaintiff
14 was called derogatory names by DHL managers pertaining to DHL'S belief that Plaintiff was too
15 old to be working at DHL, which has a pattern and practice of hiring only younger employees. In
16 keeping with this corporate pater and practice, DHL managers insisted that Plaintiff retire since he
17 was too old to work for DHL.

18 15. DHL became upset with Plaintiff when he refused to quit and/or retire since
19 Plaintiff was still fit and competent to keep working. In fact, over the 21 years of Plaintiff's tenure
20 at DHL, Plaintiff had been an exemplary worker for DHL.

21 16. Because Plaintiff refused to quit or retire, DHL management decided to concoct a
22 false reason to fire Plaintiff. On July 19, 2013, Plaintiff was ordered by DHL not to take lunch and
23 to make 4 deliveries and one pick-up immediately one after another. DHL ordered Plaintiff to do
24 this knowing that Plaintiff would eventually get dizzy and would have to stop because of
25 Plaintiff's diabetes, since he would not have had the opportunity to eat any food.

26 17. During the deliveries, Plaintiff did become dizzy because no time was given to
27 Plaintiff to eat any food. After making all of the deliveries scheduled by DHL in a timely manner,
28 and making the recovery of a pick-up of cargo, Plaintiff was forced to stop his truck on the

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1 roadside for a total period of 10 minutes in order to drink water and eat an orange, because
2 Plaintiff started to feel dizzy while driving back to the base warehouse. Plaintiff drank water and
3 ate the orange while seated in the truck and simultaneously filling out his DHL paperwork.
4 18. Thereafter, DHL fired Plaintiff for taking lunch in order to alleviate his dizziness
5 induced by the lack of food, which DHL referred to as an "unauthorized stop".

FIRST CAUSE OF ACTION

[Intentional Infliction of Emotional Distress]

6
7
8 19. Plaintiff realleges and incorporates herein by reference each and every allegation
9 contained in each and every paragraph above, inclusive.

10 20. The facts alleged in paragraphs eight (8) through eighteen (18) constitute
11 Defendants', and each of them, extreme and outrageous behavior. At all relevant times herein,
12 Defendants, and each of them, were aware of Plaintiff's concern for his emotional needs, financial
13 needs, medical needs, employment conditions and the welfare of this family. The conduct of
14 Defendants, and each of them, as hereinabove alleged was intentional and malicious, and was
15 done for the purpose of causing Plaintiff to suffer humiliation, mental anguish, and severe
16 emotional and physical distress. The conduct of Defendants, and each of them, was done with the
17 knowledge that it would cause severe emotional distress and was done with a wanton and reckless
18 disregard of the consequences to Plaintiff. The conduct of Defendants, and each of them, was
19 extreme and outrageous.

20 21. In short, DHL desired, planned, and did intentionally inflict emotional distress
21 upon Plaintiff.

22 22. As a direct and proximate result of the conduct of Defendants, Plaintiff has suffered
23 lost wages and other benefits of employment in an amount to be proven at trial.

24 23. As a further direct and proximate result of the acts of Defendants, Plaintiff has
25 sustained extreme emotional distress and pain and suffering all in an amount to be proven at trial.

26 24. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
27 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
28 safety, and economic condition, under California Civil Code section 3294, thereby entitling

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1 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
2 Defendants and DOES 1 through 50, inclusive.

3 25. Defendants' conduct described herein was undertaken by the corporate defendants'
4 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
5 the supervision and operations, communications and/or decisions. The aforementioned conduct of
6 said managing agents and individuals was therefore undertaken on behalf of the corporate
7 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
8 said individuals whose actions and conduct were ratified, authorized and approved by managing
9 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
10 and designated herein as DOES 1 through 50, inclusive.

11 **SECOND CAUSE OF ACTION**

12 **[Wrongful Employment Termination in Violation of a Public Policy]**

13 26. Plaintiff realleges and incorporates herein by reference each and every allegation
14 contained in each and every paragraph above, inclusive.

15 27. Section 8 of the California Constitution and California Government Code, section
16 12920, et. seq., and Title VII, make it a civil right to be free from discrimination, including
17 discrimination based on disability, age, retaliation and/or hostile work place, as well as, Civil
18 Code, section 51, that prohibit and render actionable any conduct of discriminating or retaliating
19 against any individual/employee because of the individual's age and/or disability.

20 28. The facts alleged in paragraphs eight (8) through eighteen (18) establish that
21 Defendants engaged in conduct that violated the public policies set forth in the various statutes and
22 constitutional provisions.

23 29. As a direct and proximate result of the conduct of Defendants, Plaintiff has suffered
24 lost wages and other benefits of employment in an amount to be proven at trial.

25 30. As a direct and proximate result of the conduct of Defendants, Plaintiff has
26 sustained emotional distress and pain and suffering all in an amount to be proven at trial.

27 31. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
28 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,

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1 safety, and economic condition, under California Civil Code section 3294, thereby entitling
2 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
3 Defendants and DOES 1 through 50, inclusive.

4 32. Defendants' conduct described herein was undertaken by the corporate defendants'
5 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
6 the supervision and operations, communications and/or decisions. The aforementioned conduct of
7 said managing agents and individuals was therefore undertaken on behalf of the corporate
8 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
9 said individuals whose actions and conduct were ratified, authorized and approved by managing
10 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
11 and designated herein as DOES 1 through 50, inclusive.

12 **THIRD CAUSE OF ACTION**

13 **[Violation of the Unfair Business Practices Act]**

14 33. Plaintiff realleges and incorporates herein by reference each and every allegation
15 contained in each and every paragraph above, inclusive.

16 34. The Business & Professions Code Section 17200 prohibits any and all means or
17 acts of unfair competition, including "any unlawful, unfair or fraudulent business act or practice
18 and unfair, deceptive, untrue or misleading advertising and any act prohibited by [law]."

19 35. The facts alleged in paragraphs eight (8) through eighteen (18) establish that
20 Defendants engaged in unfair competition by conduct that included unlawful, unfair, fraudulent,
21 deceptive, untrue or misleading statements and certifications, and other acts prohibited by law, as
22 described in paragraphs eight (8) through eighteen (18) above.

23 36. As a direct and proximate result of the conduct of Defendants, and each of them,
24 Plaintiff has suffered lost wages and other benefits of employment in an amount to be proven at
25 trial.

26 37. As a further direct and proximate result of the acts of Defendants, and each of
27 them, Plaintiff has sustained emotional distress and pain and suffering all in an amount to be
28 proven at trial.

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1 38. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
2 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
3 safety, and economic condition, under California Civil Code section 3294, thereby entitling
4 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
5 Defendants and DOES 1 through 50, inclusive.

6 39. Defendants' conduct described herein was undertaken by the corporate defendants'
7 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
8 the supervision and operations, communications and/or decisions. The aforementioned conduct of
9 said managing agents and individuals was therefore undertaken on behalf of the corporate
10 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
11 said individuals whose actions and conduct were ratified, authorized and approved by managing
12 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
13 and designated herein as DOES 1 through 50, inclusive.

14 **FOURTH CAUSE OF ACTION**

15 **[Age Discrimination]**

16 40. Plaintiff realleges and incorporates herein by reference each and every allegation
17 contained in each and every paragraph above, inclusive.

18 41. Government Code section 12940, subdivisions (a), (c), (d), (h), (j), and (k),
19 provides that it is an unlawful employment practice for an employer and/or an employment
20 agency, because of the person's age, to harass or discrimination against the employee in any way
21 as to hiring, employing, selection to training programs or training in a job, of to bar or discharge
22 an employee from employment or to discriminate in compensation, or in terms, conditions, or
23 privileges of employment. Further, an entity shall take all reasonable steps to prevent the
24 harassment from occurring.

25 42. The facts alleged in paragraphs eight (8) through eighteen (18) constitute violations
26 of the Fair Employment and Housing Act, Government Code section 12940, subdivisions (a), (c),
27 (d), (h), (j), and (k), in that the Defendants, and each of them, did discriminate against Plaintiff on
28 the basis of his age. Furthermore, Defendants, and each of them, subjected Plaintiff to harassment

1 on the basis of his age thereby creating a hostile, offensive and intimidating work environment.

2 43. As a direct and proximate result of the employment discrimination described in this
3 cause of action, Plaintiff have suffered lost wages and other benefits of employment in an amount
4 to be proven at trial.

5 44. As a further direct and proximate result of Defendants, and each of them, unlawful
6 acts, Plaintiff has sustained serious personal injuries, including, but not limited to, emotional
7 distress, pain and suffering, all in an amount to be proven at trial.

8 45. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
9 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
10 safety, and economic condition, under California Civil Code section 3294, thereby entitling
11 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
12 Defendants and DOES 1 through 50, inclusive.

13 46. Defendants' conduct described herein was undertaken by the corporate defendants'
14 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
15 the supervision and operations, communications and/or decisions. The aforementioned conduct of
16 said managing agents and individuals was therefore undertaken on behalf of the corporate
17 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
18 said individuals whose actions and conduct were ratified, authorized and approved by managing
19 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
20 and designated herein as DOES 1 through 50, inclusive.

21 **FIFTH CAUSE OF ACTION**

22 **[Disability Discrimination]**

23 47. Plaintiff realleges and incorporates herein by reference each and every allegation
24 contained in each and every paragraph above, inclusive.

25 48. Government Code sections 12926 and 12940, subdivision (a), state that it is an
26 unlawful employment practice for an employer to discharge a person from employment or to
27 discriminate against a person in terms, conditions, or privileges of employment on the grounds of
28 a physical disability, either actual or perceived.

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1 49. The facts alleged in paragraphs eight (8) through eighteen (18) constitute violations
2 of the Fair Employment and Housing Act, Government Code section 12940, subdivision (a) in that
3 the Defendant discriminated against Plaintiff on the basis of his disability, both actual and
4 perceived, by suspending him from work for seeking and receiving medical treatment for his own
5 serious health condition and by failing to attempt to reasonably accommodate his disability and by
6 failing to engage in informal discussion to informally resolve the issue of reasonable
7 accommodation.

8 50. As a direct and proximate result of Defendant's conduct described in this cause of
9 action, Plaintiff has suffered lost wages, lost employment and related benefits, and out of pocket
10 expenses, in an amount to be proven at trial.

11 51. As a further direct and proximate result of the breach of duty described in this
12 cause of action, Plaintiff has suffered serious personal injuries, including emotional distress, pain
13 and suffering and continues to suffer severe bouts of anxiety, frustration, humiliation,
14 embarrassment, anguish and emotional distress, all in an amount to be proven at the time of trial.

15 52. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
16 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
17 safety, and economic condition, under California Civil Code section 3294, thereby entitling
18 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
19 Defendants and DOES 1 through 50, inclusive.

20 53. Defendants' conduct described herein was undertaken by the corporate defendants'
21 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
22 the supervision and operations, communications and/or decisions. The aforementioned conduct of
23 said managing agents and individuals was therefore undertaken on behalf of the corporate
24 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
25 said individuals whose actions and conduct were ratified, authorized and approved by managing
26 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
27 and designated herein as DOES 1 through 50, inclusive.

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1 SIXTH CAUSE OF ACTION

2 [Failure to Reasonably Accommodate]

3 54. Plaintiff realleges and incorporates herein by reference each and every allegation
4 contained in each and every paragraph above, inclusive.

5 55. Government Code section 12940, subdivision (m), makes it an unlawful
6 employment practice for an employee to fail to make reasonable accommodation for a known
7 disability, either actual or perceived, and to fail to engage in an interactive process to find a
8 reasonable accommodation.

9 56. The facts alleged in paragraphs eight (8) through eighteen (18) constitute violations
10 of the Fair Employment and Housing Act, Government Code section 12940, subdivision (m) in
11 that Defendant had knowledge of Plaintiff's disability and of Plaintiff's demand for reasonable
12 accommodations, both general and specific. Yet, Defendant refused to either attempt or to provide
13 any reasonable accommodation for Plaintiff.

14 57. As a direct and proximate result of Defendant's conduct described in this cause of
15 action, Plaintiff has suffered lost wages, lost employment and related benefits, and out of pocket
16 expenses, in an amount to be proven at the time of trial.

17 58. As a further direct and proximate result of the breach of duty described in this
18 cause of action, Plaintiff has suffered serious personal injuries, including emotional distress, pain
19 and suffering and continues to suffer severe bouts of anxiety, frustration, humiliation,
20 embarrassment, anguish and emotional distress, all in an amount to be proven at the time of trial.

21 59. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
22 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
23 safety, and economic condition, under California Civil Code section 3294, thereby entitling
24 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
25 Defendants and DOES 1 through 50, inclusive.

26 60. Defendants' conduct described herein was undertaken by the corporate defendants'
27 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
28 the supervision and operations, communications and/or decisions. The aforementioned conduct of

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1 said managing agents and individuals was therefore undertaken on behalf of the corporate
2 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
3 said individuals whose actions and conduct were ratified, authorized and approved by managing
4 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
5 and designated herein as DOES 1 through 50, inclusive.

6 **SEVENTH CAUSE OF ACTION**

7 **[Failure to Engage in Interactive Process]**

8 61. Plaintiff realleges and incorporates herein by reference each and every allegation
9 contained in each and every paragraph above, inclusive.

10 62. Government Code section 12940, subdivision (n), makes it an unlawful
11 employment practice for an employer to fail to engage in an effective, interactive process to find a
12 reasonable accommodation, even after Plaintiff made demands for reasonable accommodation,
13 both specific and general.

14 63. The facts alleged in paragraphs eight (8) through eighteen (18) constitute violations
15 of the Fair Employment and Housing Act, Government Code section 12940, subdivision (m) in
16 that Defendant had knowledge of Plaintiff's disability. Defendant refused to consider or
17 investigate any accommodation for Plaintiff.

18 64. As a direct and proximate result of Defendant's conduct described in this cause of
19 action, Plaintiff has suffered lost wages, lost employment and related benefits, and out of pocket
20 expenses, in an amount to be proven at the time of trial.

21 65. As a further direct and proximate result of the breach of duty described in this
22 cause of action, Plaintiff has suffered serious personal injuries, including emotional distress, pain
23 and suffering and continues to suffer severe bouts of anxiety, frustration, humiliation,
24 embarrassment, anguish and emotional distress, all in an amount to be proven at the time of trial.

25 66. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
26 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
27 safety, and economic condition, under California Civil Code section 3294, thereby entitling
28 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of

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1 Defendants and DOES 1 through 50, inclusive.

2 67. Defendants' conduct described herein was undertaken by the corporate defendants'
3 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
4 the supervision and operations, communications and/or decisions. The aforementioned conduct of
5 said managing agents and individuals was therefore undertaken on behalf of the corporate
6 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
7 said individuals whose actions and conduct were ratified, authorized and approved by managing
8 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
9 and designated herein as DOES 1 through 50, inclusive.

10 **EIGHTH CAUSE OF ACTION**

11 **[Retaliation]**

12 68. Plaintiff realleges and incorporates herein by reference each and every allegation
13 contained in each and every paragraph above, inclusive.

14 69. Government Code section 12940, subdivision (h), provides that it is an unlawful
15 employment practice for an employer or any person, to discharge, expel, or otherwise discriminate
16 against any person because the person has opposed any practices forbidden under the Fair
17 Employment and Housing Act.

18 70. The facts alleged in paragraphs eight (8) through eighteen (18) constitute violations
19 of the Fair Employment and Housing Act, Government Code section 12940, subdivision (a) in that
20 Defendant took adverse employment action of not allowing Plaintiff to return to work because of
21 Plaintiff's disability and age, and because Plaintiff demanded return to work and reasonable
22 accommodations.

23 71. As a direct and proximate result of Defendant's conduct described in this cause of
24 action, Plaintiff has suffered lost wages, lost employment and related benefits, and out of pocket
25 expenses, in an amount to be proven at the time of trial.

26 72. As a further direct and proximate result of the breach of duty described in this
27 cause of action, Plaintiff has suffered serious personal injuries, including emotional distress, pain
28 and suffering and continues to suffer severe bouts of anxiety, frustration, humiliation,

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1 embarrassment, anguish and emotional distress, all in an amount to be proven at the time of trial.

2 73. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
3 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
4 safety, and economic condition, under California Civil Code section 3294, thereby entitling
5 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
6 Defendants and DOES 1 through 50, inclusive.

7 74. Defendants' conduct described herein was undertaken by the corporate defendants'
8 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
9 the supervision and operations, communications and/or decisions. The aforementioned conduct of
10 said managing agents and individuals was therefore undertaken on behalf of the corporate
11 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
12 said individuals whose actions and conduct were ratified, authorized and approved by managing
13 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
14 and designated herein as DOES 1 through 50, inclusive.

15 **NINTH CAUSE OF ACTION**

16 **[Failure to Take all Reasonable Steps to Prevent Discrimination]**

17 75. Plaintiff realleges and incorporates herein by reference each and every allegation
18 contained in each and every paragraph above, inclusive.

19 76. Government Code section 12940, subdivisions (k), provides that it is an unlawful
20 employment practice for an employer and/or an employment agency to Fail to Take all Reasonable
21 Steps to Prevent Discrimination against the employee in any way as to hiring, employing,
22 selection to training programs or training in a job, of to bar or discharge an employee from
23 employment or to discriminate in compensation, or in terms, conditions, or privileges of
24 employment. Further, an entity shall take all reasonable steps to prevent the harassment from
25 occurring.

26 77. The facts alleged in paragraphs eight (8) through eighteen (18) constitute violations
27 of the Fair Employment and Housing Act, Government Code section 12940, subdivision (k) in
28 that the Defendants, and each of them, did to Fail to Take all Reasonable Steps to Prevent

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1 Discrimination against the Plaintiff.

2 78. As a direct and proximate result of the employment discrimination described in this
3 cause of action, Plaintiff has suffered lost wages and other benefits of employment in an amount to
4 be proven at trial.

5 79. As a further direct and proximate result of Defendants, and each of them, unlawful
6 acts, Plaintiff has sustained serious personal injuries, including, but not limited to, emotional
7 distress, pain and suffering, all in an amount to be proven at trial.

8 80. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
9 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
10 safety, and economic condition, under California Civil Code section 3294, thereby entitling
11 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
12 Defendants and DOES 1 through 50, inclusive.

13 81. Defendants' conduct described herein was undertaken by the corporate defendants'
14 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
15 the supervision and operations, communications and/or decisions. The aforementioned conduct of
16 said managing agents and individuals was therefore undertaken on behalf of the corporate
17 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
18 said individuals whose actions and conduct were ratified, authorized and approved by managing
19 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
20 and designated herein as DOES 1 through 50, inclusive.

21 **TENTH CAUSE OF ACTION**

22 **[Violation of Labor Code section 1102.5]**

23 82. Plaintiff realleges and incorporates herein by reference each and every allegation
24 contained in each and every paragraph above, inclusive.

25 83. Labor Code section 1102.5 provides that an employer may neither retaliate against
26 an employee who reports to a governmental agency his/her reasonable belief that the employer
27 violated state or federal laws nor may the employer retaliate against the employee who refused to
28 participate in an activity that the employee reasonably believes would result in violation of state or

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1 federal law.

2 84. The facts alleged in paragraphs eight (8) through eighteen (18) establish that DHL
3 engaged in improper activity in violation of the mandates of FEHA and the California
4 Constitution. Plaintiff complained to DHL about the various violations of federal and state laws.
5 Plaintiff refused to participate in an activity that he and DHL reasonably believed would result in
6 violation of state or federal law. DHL retaliated against Plaintiff for his refusal to participate in
7 such illegal activities by management.

8 85. As a direct and proximate result of DHL's wrongful conduct, Plaintiff has suffered
9 lost wages and other benefits of employment in an amount to be proven at the time of trial.

10 86. As a further direct and proximate result of DHL's unlawful acts, Plaintiff has
11 sustained serious personal injuries, including, but not limited to, emotional distress, pain and
12 suffering, all in an amount to be proven at the time of trial.

13 87. Plaintiff alleges that the conduct of the Defendants, as alleged hereinabove, was
14 malicious, oppressive or fraudulent, or taken in conscious disregard to Plaintiff's rights, health,
15 safety, and economic condition, under California Civil Code section 3294, thereby entitling
16 Plaintiff to an award of punitive damages in an amount appropriate to punish or set an example of
17 Defendants and DOES 1 through 50, inclusive.

18 88. Defendants' conduct described herein was undertaken by the corporate defendants'
19 officers or managing agents, identified herein as DOES 1 through 50, who were responsible for
20 the supervision and operations, communications and/or decisions. The aforementioned conduct of
21 said managing agents and individuals was therefore undertaken on behalf of the corporate
22 defendant. Said corporate defendant further had advanced knowledge of the actions and conduct of
23 said individuals whose actions and conduct were ratified, authorized and approved by managing
24 agents whose precise identities are unknown to Plaintiff at this time and are therefore identified
25 and designated herein as DOES 1 through 50, inclusive.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff prays that this Court enter judgment in favor of Plaintiff and
28 order the Defendant to do the following:

1. As to the 1st, 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, and 10th causes of action, order Defendants, and each of them respectively, to pay compensatory damages to Plaintiffs for lost earnings and other benefits of employment, according to proof, with interest at the applicable legal rate, including, but not limited to, tripling of actual damages pursuant to Civil Code section 52, subdivision (a) and (h).

2. As to the 1st, 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, and 10th causes of action, order Defendants, and each of them, respectively, to pay compensatory damages to Plaintiff to compensate for the emotional distress they suffered as a direct and proximate result of Defendants' unlawful conduct, according to proof, including, but not limited to, tripling of actual damages pursuant to Civil Code section 52, subdivision (a) and (h).

3. As to the 1st, 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, and 10th causes of action, order Defendants, and each of them, respectively, to pay punitive damages to Plaintiff to compensate for the malicious, fraudulent and oppressive conduct of Defendants, according to proof.

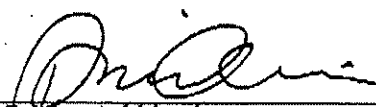
4. As to the 1st, 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, and 10th causes of action, enjoin Defendants, and each of them, its successors, agents, employees and all other persons acting on its behalf, to cease and desist from refusing to comply with the statutory provisions described above.

5. As to all causes of action, order such other and further relief as the Court may deem just and proper, including attorney fees and pre-judgment interest.

Dated: April 10, 2015

LAW OFFICES OF REGINA ASHKINADZE

By:


Regina Ashkinadze
Attorneys for Plaintiff SALVADOR
NAVARRO

04/14/2015

CM-010

| | | |
|--|--|--|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Regina Ashkinadze (SBN 256908) 1219 Morningside Drive, Suite 128 Manhattan Beach, CA 90266 TELEPHONE NO.: 310-285-8595 FAX NO.: 310-300-2112 ATTORNEY FOR (Name): Salvador Navarro SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Central | | FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles APR 10 2015 Sherri R. Carter, Executive Officer/Clerk By <u>Dawn Alexander</u> Deputy |
| CASE NAME: Salvador Navarro v. DHL Global Forwarding | | CASE NUMBER: BC 577 056 |
| CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) | <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) | Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) |
| JUDGE: | | DEPT: |

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

| | | |
|---|--|--|
| Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other P/DPDWD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (48) <input type="checkbox"/> Other P/DPDWD (23) Non-P/DPDWD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/DPDWD tort (35) Employment <input checked="" type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15) | Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (28) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (08) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39) | Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43) |
|---|--|--|

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| f. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): 10, employment discrimination, wrongful termination, retaliation
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 10, 2015

Regina Ashkinadze

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

CM-010

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (If the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto)

Other PUPD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (not asbestos or toxic/environmental) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PUPD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PUPD/WD

Non-PUPD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (18)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (not medical or legal)
Other Non-PUPD/WD Tort (35)
Employment
Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)
Contract/Warranty Breach—Seller Plaintiff (not fraud or negligence)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (not provisionally complex) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (not eminent domain, landlord/tenant, or foreclosure)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (If the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (arising from provisionally complex case type listed above) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (non-domestic relations)
Sister State Judgment
Administrative Agency Award (not unpaid taxes)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (not specified above) (42)
Declaratory Relief Only
Injunctive Relief Only (non-harassment)
Mechanics Lien
Other Commercial Complaint Case (non-tort/non-complex)
Other Civil Complaint (non-tort/non-complex)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (not specified above) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

Exhibit A

Page 18 of 22

SHORT TITLE:

Navarro v. DHL Global Forwarding

CASE NUMBER

BC 577 058

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 7-10 ☐ HOURS/ ☒ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column B below which best describes the nature of this case.

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (see Column C below)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle. |
| 2. May be filed in central (other county, or no bodily injury/property damage). | 7. Location where petitioner resides. |
| 3. Location where cause of action arose. | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred. | 9. Location where one or more of the parties reside. |
| 5. Location where performance required or defendant resides. | 10. Location of Labor Commissioner Office |

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

| | | | |
|--|---|---|--------------------------------------|
| Auto Tort 1 4 Other Personal Injury/Property Damage/Wrongful Death/Tort | Auto (22) | <input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death | 1., 2., 4. |
| | Uninsured Motorist (46) | <input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death - Uninsured Motorist | 1., 2., 4. |
| | Asbestos (04) | <input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death | 2. 2. |
| | Product Liability (24) | <input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental) | 1., 2., 3., 4., 6. |
| | Medical Malpractice (46) | <input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice | 1., 4. 1., 4. |
| | Other Personal Injury Property Damage Wrongful Death (23) | <input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death | 1., 4. 1., 4. 1., 3. 1., 4. |

| | |
|---|-------------|
| SHORT TITLE: Navarro v. DHL Global Forwarding | CASE NUMBER |
|---|-------------|

Non-Personal Injury/Property
Damage/Wrongful Death Tort

Employment

Contract

Real Property
Unlawful Detainer

| | | |
|---|---|--|
| Business Tort (07) | <input type="checkbox"/> A6028 Other Commercial/Business Tort (not fraud/breach of contract) | 1., 3. |
| Civil Rights (08) | <input type="checkbox"/> A6005 Civil Rights/Discrimination | 1., 2., 3. |
| Defamation (13) | <input type="checkbox"/> A6010 Defamation (slander/libel) | 1., 2., 3. |
| Fraud (18) | <input type="checkbox"/> A6013 Fraud (no contract) | 1., 2., 3. |
| Professional Negligence (26) | <input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal) | 1., 2., 3. 1., 2., 3. |
| Other (35) | <input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort | 2., 3. |
| Wrongful Termination (36) | <input checked="" type="checkbox"/> A6037 Wrongful Termination | 1., 2., 3. |
| Other Employment (15) | <input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals | 1., 2., 3. 10. |
| Breach of Contract/Warranty (06) (not insurance) | <input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence) | 2., 6. 2., 5. 1., 2., 5. 1., 2., 5. |
| Collections (09) | <input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case | 2., 5., 6. 2., 5. |
| Insurance Coverage (18) | <input type="checkbox"/> A6015 Insurance Coverage (not complex) | 1., 2., 5., 6. |
| Other Contract (37) | <input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence) | 1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 6. |
| Eminent Domain/Inverse Condemnation (14) | <input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____ | 2. |
| Wrongful Eviction (33) | <input type="checkbox"/> A6023 Wrongful Eviction Case | 2., 6. |
| Other Real Property (28) | <input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6030 Other Real Property (not eminent domain, landlord/tenant, foreclosure) | 2., 6. 2., 6. 2., 6. |
| Unlawful Detainer-Commercial (31) | <input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction) | 2., 6. |
| Unlawful Detainer-Residential (32) | <input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction) | 2., 6. |
| Unlawful Detainer-Post-Foreclosure (34) | <input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure | 2., 6. |
| Unlawful Detainer-Drugs (38) | <input type="checkbox"/> A6022 Unlawful Detainer-Drugs | 2., 6. |

SHORT TITLE:

Navarro v. DHL Global Forwarding

CASE NUMBER

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

| | | |
|--|--|--|
| Asset Forfeiture (05) | <input type="checkbox"/> A8108 Asset Forfeiture Case | 2., 8. |
| Petition re Arbitration (11) | <input type="checkbox"/> A8115 Petition to Compel/Confirm/Vacate Arbitration | 2., 5. |
| Writ of Mandate (02) | <input type="checkbox"/> A8151 Writ - Administrative Mandamus <input type="checkbox"/> A8152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A8153 Writ - Other Limited Court Case Review | 2., 8. 2. 2. |
| Other Judicial Review (39) | <input type="checkbox"/> A8150 Other Writ/Judicial Review | 2., 8. |
| Antitrust/Trade Regulation (03) | <input type="checkbox"/> A8003 Antitrust/Trade Regulation | 1., 2., 8. |
| Construction Defect (10) | <input type="checkbox"/> A8007 Construction Defect | 1., 2., 3. |
| Claims Involving Mass Tort (40) | <input type="checkbox"/> A8006 Claims Involving Mass Tort | 1., 2., 8. |
| Securities Litigation (28) | <input type="checkbox"/> A8035 Securities Litigation Case | 1., 2., 8. |
| Toxic Tort Environmental (30) | <input type="checkbox"/> A8036 Toxic Tort/Environmental | 1., 2., 3., 8. |
| Insurance Coverage Claims from Complex Case (41) | <input type="checkbox"/> A8014 Insurance Coverage/Subrogation (complex case only) | 1., 2., 5., 8. |
| Enforcement of Judgment (20) | <input type="checkbox"/> A8141 Sister State Judgment <input type="checkbox"/> A8160 Abstract of Judgment <input type="checkbox"/> A8107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A8140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A8114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A8112 Other Enforcement of Judgment Case | 2., 9. 2., 8. 2., 9. 2., 8. 2., 8. 2., 8., 9. |
| RICO (27) | <input type="checkbox"/> A8033 Racketeering (RICO) Case | 1., 2., 8. |
| Other Complaints (Not Specified Above) (42) | <input type="checkbox"/> A8030 Declaratory Relief Only <input type="checkbox"/> A8040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A8011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A8000 Other Civil Complaint (non-tort/non-complex) | 1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8. |
| Partnership Corporation Governance (21) | <input type="checkbox"/> A8113 Partnership and Corporate Governance Case | 2., 8. |
| Other Petitions (Not Specified Above) (43) | <input type="checkbox"/> A8121 Civil Harassment <input type="checkbox"/> A8123 Workplace Harassment <input type="checkbox"/> A8124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A8190 Election Contest <input type="checkbox"/> A8110 Petition for Change of Name <input type="checkbox"/> A8170 Petition for Relief from Late Claim Law <input type="checkbox"/> A8100 Other Civil Petition | 2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 9., 4., 8. 2., 9. |

| | |
|--|-------------|
| SHORT TITLE: Navarro v. DHL Global Forwarding | CASE NUMBER |
|--|-------------|

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

| | | |
|--|--------------|---|
| REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case. <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. | | ADDRESS: 4000 Redondo Beach Ave #103 |
| CITY: Redondo Beach | STATE: CA | ZIP CODE: 90278 |

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: April 10, 2015


(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.